Richard E. Leff, Esq. (RL-2123) McGIVNEY & KLUGER, P.C. 80 Broad Street, 23<sup>rd</sup> Floor New York, New York 10004 (212) 509-3456

Attorneys for Defendants: AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD. and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 103 (AKH)

GUY ZAMMITT (AND WIFE, DEANNA ZAMMITT),

Docket No.: 06-CV-15155

Plaintiff(s),

NOTICE OF ADOPTION OF ANSWER

TO MASTER COMPLAINT

-against-

**ELECTRONICALLY FILED** 

ALAN KASMAN DBA KASCO, et al.,

Defendant(s).

PLEASE TAKE NOTICE that Defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., by their attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 103 (AKH).

WHEREFORE, the defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., demand judgment dismissing the above-captioned action as against them,

together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York October 2, 2007

Yours etc.,

McGIVNEY & KLUGER, P.C.
Attorneys for Defendants
AMERICAN EXPRESS COMPANY, AMERICAN
EXPRESS BANK, LTD and AMERICAN
EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

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TO: WORBY GRONER & NAPOLI BERN, LLP Plaintiffs Liaison
In Re Lower Manhattan Disaster Site Litigation
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All Defense Counsel